

"UNDER SEAL"

FILED
IN COURT
CHARLOTTE, N. C.

JUL 26 2007

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

**U. S. DISTRICT COURT
W. DIST. OF N. C.**

UNITED STATES OF AMERICA

DOCKET NO. 3:07 CR 93-W

**SECOND SUPERSEDING
BILL OF INDICTMENT**

v.

Violations:

**(01) PAUL PO CHAN
(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"**

**18 U.S.C. § 371
18 U.S.C. § 1343
18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1029(a)(1)
18 U.S.C. § 1029(a)(3)
18 U.S.C. § 1029(a)(5)
18 U.S.C. § 2**

THE GRAND JURY CHARGES:

INTRODUCTION

1. On or about November 2006 through April 2007, **Paul Po Chan and Tek Soong Ng, a.k.a., "Wong," a.k.a., "Big Wong,"** and others both known and unknown to the grand jury, engaged in a scheme to commit identity theft, credit card fraud, and wire fraud in the Western District of North Carolina. **Paul Po Chan** and **"Big Wong,"** used counterfeit credit cards, and other counterfeit access devices, encoded with the access device numbers of other people, to fraudulently purchase Rolex watches, gift cards, merchandise and postage stamps. In furtherance of this conspiracy:

a. On or about November 16, 2006, **Paul Po Chan** and a woman, known as Mary Ban, accompanied by **"Big Wong,"** purchased Rolex watches with counterfeit access device cards at Carlyle & Co., South Park Mall, in Charlotte, North Carolina.

b. On or about March 27, 2007, **"Big Wong"** drove **Paul Po Chan** to Office Depot, 1620 South Boulevard, Charlotte, North Carolina and Best Buy, 10600 Centrum Parkway, Pineville, North Carolina. **Paul Po Chan** made purchases with counterfeit access devices at both Office Depot, 1620 South Boulevard, Charlotte, North Carolina and Best Buy, 10600 Centrum Parkway, Pineville, North Carolina. **"Big Wong,"** drove **Paul Po Chan** to the Office Depot and dropped him off. **"Big Wong,"** then went into the Office Depot while **Paul Po Chan** used a counterfeit access device. **Paul Po Chan** left the Office Depot shortly after

"Big Wong," left the store.

c. On or about March 28, 2007, **Paul Po Chan** made purchases with a counterfeit access device at Office Depot, 8658 J.W. Clay Boulevard, Charlotte, North Carolina; Home Depot, 8135 University City Boulevard, Charlotte, North Carolina; and Best Buy, J.W. Clay Boulevard, Charlotte, North Carolina.

d. On or about March 29, 2007, **Paul Po Chan**, accompanied by **"Big Wong,"** attempted to purchase gift cards using a counterfeit access device at Best Buy, 8813, J.W. Clay Boulevard, Charlotte, North Carolina. **Paul Po Chan**, at that time, had in his possession fifteen (15) counterfeit and unauthorized access devices and one fictitious California driver's license.

e. On or about March 29, 2007, **Paul Po Chan** fraudulently purchased postage stamps using a counterfeit and unauthorized access device at an automated stamp machine located at the United States Post Office in Huntersville, North Carolina. Four minutes later, **"Big Wong,"** fraudulently purchased postage stamps using a counterfeit and unauthorized access device at the same automated stamp machine.

f. On or about April 5, 2007 through April 12, 2007, **"Big Wong,"** fraudulently purchased postage stamps using a counterfeit and unauthorized access device at an automated stamp machine located at the United States Post Office- Randolph Station, in Charlotte, North Carolina.

g. On or about March 31, 2007 through April 3, 2007, **"Big Wong,"** fraudulently purchased postage stamps using counterfeit and unauthorized access devices at an automated stamp machine located at the United States Post Office- Randolph Station, in Charlotte, North Carolina.

COUNT ONE

2. The Introduction is realleged and fully incorporated herein by reference.

3. On or about November 2006 through April 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

(01) **PAUL PO CHAN**
(02) **TEK SOONG NG**
a.k.a. **"WONG"**
a.k.a. **"BIG WONG"**

did knowingly and willfully combine, conspire, confederate and agree with others both known and unknown to the grand jury to commit offenses against the United States including, but not limited to, violation of Title 18, United States Code, Sections 1028A (aggravated identity theft); 1029 (access device fraud); and 1343 (wire fraud).

MANNER AND MEANS

4. **Paul Po Chan** and **"Big Wong,"** and others known and unknown to the grand jury carried out the conspiracy in the manner and means described in the Introduction, paragraph 1, among others.

OVERT ACTS

5. In furtherance of this conspiracy and to effect the objects thereof, there was committed by at least one of the co-conspirators, in the Western District of North Carolina, and elsewhere, at least one overt act taken, as described in the Introduction, paragraph 1, among others.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

6. The Introduction is realleged and fully incorporated herein by reference.

7. On or about November 16, 2006, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN

aiding and abetting others both known and unknown to the grand jury, did knowingly and with intent to defraud use two counterfeit access devices to wit: American Express cards, said activity affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

COUNT THREE

8. The Introduction is realleged and fully incorporated herein by reference.

9. On or about November 16, 2006, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN

aiding and abetting others both known and unknown to the grand jury, did knowingly possess, without lawful authority, a means of identification of another person, to wit, access devices, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Section 1029(a)(1) (access device fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT FOUR

10. The Introduction is realleged and fully incorporated herein by reference.

11. On or about March 27, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN

did knowingly and with intent to defraud use a counterfeit access device to wit: a credit card, said activity affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(1).

COUNT FIVE

12. The Introduction is realleged and fully incorporated herein by reference

13. On or about March 27, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN

did knowingly possess, without lawful authority, a means of identification of another person, to wit, an access device, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Section 1029(a)(1) (access device fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT SIX

14. The Introduction is realleged and fully incorporated herein by reference.

15. On or about March 28, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN

did knowingly and with intent to defraud use a counterfeit access device to wit: a credit card, said activity affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(1).

COUNT SEVEN

16. The Introduction is realleged and fully incorporated herein by reference.

17. On or about March 28, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN

did knowingly and with intent to defraud effect transactions with an access device, to wit: a credit card, issued to another person, to receive things of value during any one-year period, the aggregate value of which was equal to and greater than \$1,000, said activity affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(5).

COUNT EIGHT

18. The Introduction is realleged and fully incorporated herein by reference.

19. On or about March 28, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN

did knowingly possess, without lawful authority, a means of identification of another person, to wit, access devices, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Sections 1029(a)(1) and 1029(a)(5) (access device fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT NINE

20. The Introduction is realleged and fully incorporated herein by reference.

21. On or about March 29, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN

did knowingly and with intent to defraud possess fifteen (15) counterfeit and unauthorized access devices to wit: credit cards, said activity affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(3).

COUNT TEN

22. The Introduction is realleged and fully incorporated herein by reference.

23. On or about March 29, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN

did knowingly possess, without lawful authority, a means of identification of another person, to wit, a fictitious California driver's license and access devices, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Section 1029(a)(3) (access device fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT ELEVEN

24. The Introduction is realleged and fully incorporated herein by reference.

25. On or about March 29, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN
(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

aiding and abetting each other and others both known and unknown to the grand jury, did devise a scheme and artifice to defraud, and for obtaining property, to wit: postage stamps, by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, and signals for the purpose of executing such scheme and artifice affecting a financial institution, in violation of Title 18 United States Code, Sections 1343 and 2.

COUNT TWELVE

26. The Introduction is realleged and fully incorporated herein by reference.

27. On or about March 29, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN
(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

aiding and abetting each other and others both known and unknown to the grand jury, did knowingly and with intent to defraud use counterfeit access devices to wit: counterfeit credit cards, said activity affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

COUNT THIRTEEN

28. The Introduction is realleged and fully incorporated herein by reference.

29. On or about March 29, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(01) PAUL PO CHAN
(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

aiding and abetting each other and others both known and unknown to the grand jury, did knowingly possess, without lawful authority, a means of identification of another person, to wit, access devices, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Sections 1029(a)(1) (access device fraud) and 1343 (wire fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT FOURTEEN

30. The Introduction is realleged and fully incorporated herein by reference.

31. On or about April 5, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did devise a scheme and artifice to defraud, and for obtaining property, to wit: postage stamps, by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, and signals for the purpose of executing such scheme and artifice affecting a financial institution, in violation of Title 18 United States Code, Section 1343.

COUNT FIFTEEN

32. The Introduction is realleged and fully incorporated herein by reference.

33.. On or about April 5, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly and with intent to defraud use a counterfeit access device to wit: a counterfeit credit card, said activity affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(1).

COUNT SIXTEEN

34. The Introduction is realleged and fully incorporated herein by reference.

35. On or about April 5, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly possess, without lawful authority, a means of identification of another person, to wit, an access device, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Sections 1029(a)(1) (access device fraud) and 1343 (wire fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT SEVENTEEN

36. The Introduction is realleged and fully incorporated herein by reference.

37. On or about April 6, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did devise a scheme and artifice to defraud, and for obtaining property, to wit: postage stamps, by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to

be transmitted by means of wire communication in interstate commerce, writings, signs, and signals for the purpose of executing such scheme and artifice affecting a financial institution, in violation of Title 18 United States Code, Section 1343.

COUNT EIGHTEEN

38. The Introduction is realleged and fully incorporated herein by reference.

39.. On or about April 6, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly and with intent to defraud use a counterfeit access device to wit: a counterfeit credit card, said activity affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(1).

COUNT NINETEEN

40. The Introduction is realleged and fully incorporated herein by reference.

41. On or about April 6, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly possess, without lawful authority, a means of identification of another person, to wit, an access device, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Sections 1029(a)(1) (access device fraud) and 1343 (wire fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT TWENTY

42. The Introduction is realleged and fully incorporated herein by reference.

43. On or about April 7, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did devise a scheme and artifice to defraud, and for obtaining property, to wit: postage stamps, by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, and signals for the purpose of executing such scheme and artifice affecting a financial institution, in violation of Title 18 United States Code, Section 1343.

COUNT TWENTY-ONE

44. The Introduction is realleged and fully incorporated herein by reference.

45. On or about April 7, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly and with intent to defraud use a counterfeit access device to wit: a counterfeit credit card, said activity affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(1).

COUNT TWENTY-TWO

46. The Introduction is realleged and fully incorporated herein by reference.

47. On or about April 7, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"

a.k.a. "BIG WONG"

did knowingly possess, without lawful authority, a means of identification of another person, to wit, an access device, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Sections 1029(a)(1) (access device fraud) and 1343 (wire fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT TWENTY-THREE

48. The Introduction is realleged and fully incorporated herein by reference.

49. On or about April 8, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did devise a scheme and artifice to defraud, and for obtaining property, to wit: postage stamps, by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, and signals for the purpose of executing such scheme and artifice affecting a financial institution, in violation of Title 18 United States Code, Section 1343.

COUNT TWENTY-FOUR

50. The Introduction is realleged and fully incorporated herein by reference.

51. On or about April 8, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly and with intent to defraud use a counterfeit access device to wit: a counterfeit credit card, said activity affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(1).

COUNT TWENTY-FIVE

52. The Introduction is realleged and fully incorporated herein by reference.

53. On or about April 8, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly possess, without lawful authority, a means of identification of another person, to wit, an access device, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Sections 1029(a)(1) (access device fraud) and 1343 (wire fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT TWENTY-SIX

54. The Introduction is realleged and fully incorporated herein by reference.

55. On or about April 9, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did devise a scheme and artifice to defraud, and for obtaining property, to wit: postage stamps, by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, and signals for the purpose of executing such scheme and artifice affecting a financial institution, in violation of Title 18 United States Code, Section 1343.

COUNT TWENTY-SEVEN

56. The Introduction is realleged and fully incorporated herein by reference.

57. On or about April 9, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly and with intent to defraud use a counterfeit access device to wit: a counterfeit credit card, said activity affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(1).

COUNT TWENTY-EIGHT

58. The Introduction is realleged and fully incorporated herein by reference.

59. On or about April 9, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly possess, without lawful authority, a means of identification of another person, to wit, an access device, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Sections 1029(a)(1) (access device fraud) and 1343 (wire fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT TWENTY-NINE

60. The Introduction is realleged and fully incorporated herein by reference.

61. On or about April 10, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did devise a scheme and artifice to defraud, and for obtaining property, to wit: postage stamps, by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, and signals for the purpose of executing such scheme and artifice affecting a financial institution, in violation of Title 18 United States Code, Section 1343.

COUNT THIRTY

62. The Introduction is realleged and fully incorporated herein by reference.

63. On or about April 10, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly and with intent to defraud use a counterfeit access device to wit: a counterfeit credit card, said activity affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(1).

COUNT THIRTY-ONE

64. The Introduction is realleged and fully incorporated herein by reference.

65. On or about April 10, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly possess, without lawful authority, a means of identification of another person, to wit, an access device, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to

wit, Title 18, United States Code, Sections 1029(a)(1) (access device fraud) and 1343 (wire fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT THIRTY-TWO

66. The Introduction is realleged and fully incorporated herein by reference.

67. On or about April 11, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did devise a scheme and artifice to defraud, and for obtaining property, to wit: postage stamps, by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, and signals for the purpose of executing such scheme and artifice affecting a financial institution, in violation of Title 18 United States Code, Section 1343.

COUNT THIRTY-THREE

68. The Introduction is realleged and fully incorporated herein by reference.

69. On or about April 11, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly and with intent to defraud use a counterfeit access device to wit: a counterfeit credit card, said activity affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(1).

COUNT THIRTY-FOUR

70. The Introduction is realleged and fully incorporated herein by reference.

71. On or about April 11, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly possess, without lawful authority, a means of identification of another person, to wit, an access device, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Sections 1029(a)(1) (access device fraud) and 1343 (wire fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

COUNT THIRTY-FIVE

72. The Introduction is realleged and fully incorporated herein by reference.

73. On or about April 12, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did devise a scheme and artifice to defraud, and for obtaining property, to wit: postage stamps, by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, and signals for the purpose of executing such scheme and artifice affecting a financial institution, in violation of Title 18 United States Code, Section 1343.

COUNT THIRTY-SIX

74. The Introduction is realleged and fully incorporated herein by reference.

75. On or about April 12, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly and with intent to defraud use a counterfeit access device to wit: a counterfeit credit card, said activity affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(1).

COUNT THIRTY-SEVEN

76. The Introduction is realleged and fully incorporated herein by reference.

77. On or about April 12, 2007, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

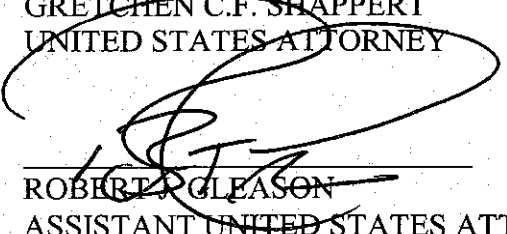
(02) TEK SOONG NG
a.k.a. "WONG"
a.k.a. "BIG WONG"

did knowingly possess, without lawful authority, a means of identification of another person, to wit, an access device, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, Title 18, United States Code, Sections 1029(a)(1) (access device fraud) and 1343 (wire fraud).

All in violation of Title 18, United States Code, Sections 1028A(a)(1).

A TRUE BILL:

GRETCHEN C.F. SHAPPERT
UNITED STATES ATTORNEY


ROBERT GLEASON
ASSISTANT UNITED STATES ATTORNEY